IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of	:	Customer Number: 46320
	:	
David KAMINSKY et al.	:	Confirmation Number: 1392
	:	
Application No.: 10/635,587	:	Group Art Unit: 2453
	:	
Filed: August 6, 2003	:	Examiner: T. Najee-Ullah
	:	
For: AUTONOMIC ASSISTANCE FOR POLICY GENERATION		

REPLY BRIEF

Mail Stop Appeal Brief - Patents
Commissioner For Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

This Reply Brief is submitted under 37 C.F.R. § 41.41 in response to the EXAMINER'S

ANSWER dated October 16, 2009.

The Examiner's response to Appellants' arguments submitted in the Second Appeal Brief

of April 28, 2009, raises additional issues and underscores the factual and legal shortcomings in

the Examiner's rejection. In response, Appellants rely upon the arguments presented in the

Appeal Brief of April 28, 2009, and the arguments set forth below.

1   **REMARKS**

2

3   <u>Non-Compliant Examiner's Answer</u>

4   On page 4 of the Second Appeal Brief, Appellants pointed out where the Examiner's

5   Answer is required to include particular content discussed in M.P.E.P. § 1207.02, yet the

6   Examiner has completely ignored this requirement in the Examiner's Answer. As noted

7   throughout the prosecution of this application and in the Second Appeal Brief, the Examiner has

8   failed to properly establish the facts underlying the Examiner's analysis. Appellants' position is

9   that these omissions in the Examiner's prima facie analysis are correctable by the Examiner, and

10   the correction of these omissions would help both Appellants and the Honorable Board gain a

11   better understanding of the alleged findings of facts and analysis employed by the Examiner in

12   rejecting the claims. Thus, Appellants respectfully request that the Honorable Board remand the

13   present application to the Examiner to address these omissions.[1]

14

15   Appellants have compared the statement of the rejection found on pages 3-8 of the

16   Examiner's Answer with the statement of the rejection found on pages 5-11 of the Third Office

17   Action. Upon making this comparison, Appellants have been unable to discover any substantial

18   differences between the respective statements of the rejection. As such, Appellants proceed on

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[1] The Board has persistently declined to uphold an Examiner because of omissions in the Examiner's half of the record. E.g., <u>Ex parte Daleiden</u>, Appeal 2007-1003 (Mar. 14, 2007) (remanding because examiner failed to respond to arguments in the Appeal Brief); <u>Ex parte Rozzi</u>, 63 USPQ2d 1196, 1200-03 (BPAI 2002) (remanding without decision because of a host of examiner omissions and procedural errors); <u>Ex parte Gambogi</u>, 62 USPQ2d 1209, 1212 (BPAI 2001) ("We decline to tell an examiner precisely how to set out a rejection."); <u>Ex parte Jones</u>, 62 USPQ2d 1206, 1208 (BPAI 2001) (refusing to adjudicate an issue that the examiner has not developed); <u>Ex parte Schricker</u>, 56 USPQ2d 1723, 1725 (BPAI 2000) ("The examiner has left applicant and the board to guess as to the basis of the rejection ... We are not good at guessing; hence, we decline to guess."); <u>Ex parte Braeken</u>, 54 USPQ2d 1110, 1112-13 (BPAI 1999) (noting that the appeal is "not ripe" because of omissions and defects in the examiner's analysis).

1   the basis that the Examiner's sole response to Appellants' Appeal Brief is found on pages 8-17 of

2   the Examiner's Answer in the section entitled "Response to Argument."

3

4 _____

5   Referring to page 3 of the Examiner's Answer, the Examiner relied solely upon Gai to

6   teach the claimed "said workflow component comprising a further configuration for routing

7   stimuli and response data from said system under study to a selected one of said policy makers."

8   On page 10, line 17 through page 11, line 33 of the Second Appeal Brief, Appellants argued that

9   Gai fails to teach all of these limitations. The Examiner's response to these arguments is found

10   on pages 11 and 12 of the Examiner's Answer.

11

12   After asserting that Gai teaches a router 318 that communicates messages with a policy

13   server 322, the Examiner asserted the following on page 11 of the Examiner's Answer:

14   As noted in these aforementioned arguments, Examiner relies upon the Appellant's disclosure for

15   the definition of stimuli and response. It is the opinion of the Examiner that Gai specifically

16   teaches high-level policies and rules generated (Gai, col. 6, lines 19-25), i.e. responses, in response

17   to different network traffic situations and conditions (Gai, col. 6, line 12-19), i.e. stimuli.

18   However, Gai fails to explicitly state or teach the examples of stimuli and response presented in

19   the Applicant's disclosure on pg. 9, par. 18. Examiner relies upon Rogers to teach this aspect of the

20   invention ...(emphasis added)

21

22   The Examiner's analysis, however, does not comport with the claimed limitations. Moreover, the

23   Examiner mischaracterizes the teachings of Gai.

24

1   As claimed, the stimuli and response data is <u>from said system under study</u>. Referring to

2   column 6, lines 12-26 (i.e., the alleged stimuli and response), Gai teaches:

3   <u>Each policy server translates the high-level policies inherent in the selected traffic template,</u>

4   <u>location-specific policies and data structures into a set of rules</u> and may combine several related

5   rules into a single transaction. Upon initialization, intermediate devices request traffic

6   management information from the one or more policy servers. The policy server replies with a

7   particular set of transactions and rules that are utilized by the intermediate devices for traffic

8   management decisions. By propagating these rules across the network domain, each of the

9   dissimilar intermediate devices can configure its corresponding traffic management components

10 and mechanisms to operate in such a manner as to implement the high-level policies selected by

11 the network administrator. (emphasis added)

12

13 Contrary to the Examiner's assertion, the Examiner's cited passage within Gai does not teach

14 sending "different network traffic situations and conditions" as a form of "stimuli," as claimed.

15 In fact, the Examiner's cited passage makes no mention of "different network traffic situations

16 and conditions."

17

18 The Examiner's cited passage of column 6, lines 12-26 of Gai is very similar to the

19 Abstract of Gai, which describes the teachings of Gai, in general. As described therein "high-

20 level policies, which are generally device-independent, are translated by one or more policy

21 servers into a set of rules that can be put into effect by specific network devices." Thus, the

22 purpose of the policy server is to create of rules that will be applied by specific network devices.

23 Specifically, the "policy server translates the high-level policies inherent in the selected traffic

24 template and location-specific policies into a set of rules, which may include one or more access

25 control lists, and may combine several related rules into a single transaction." Gai further

1   describes "[t]he rules, which may correspond to the particular roles assigned to the interfaces, are

2   then utilized by the intermediate devices to configure their particular services and traffic

3   management mechanisms."

4

5   Referring back to the Examiner's analysis, Gai does not teach transmitting "high-level

6   policies and rules … i.e. responses" and "different network traffic situations and conditions …

7   i.e. stimuli" from a system under study. First, the high-level policies are what is used to generate

8   the rules, and this is not data "from a system under study." Additionally, the rules are not sent to

9   the policy server 322 (i.e., allegedly corresponding to he claimed selected policy maker). On the

10   contrary, the policy server 322 generates the rules. Additionally, the rules generated by the

11   policy server 322 are <u>not</u> <u>responses</u> to "different network traffic situations and conditions" (i.e.,

12   the alleged stimuli). Instead, the rules are generated irrespective of the different network traffic

13   situations and conditions since the rules are translated from "the high-level policies inherent in

14   the selected traffic template, location-specific policies and data structures." Thus, Appellants

15   maintain that the Examiner has failed to properly characterize the scope and content of Gai.

16

17   The Examiner asserted that "Gai fails to explicitly state or teach the examples of stimuli

18   and response presented in the Appellant's disclosure on pg. 9, par. 18. Examiner relies upon

19   Rogers to teach this aspect of the invention." On one hand ,the Examiner is characterizing Gai as

20   teaching the limitations associated with the stimuli and response data, yet on the other hand, the

21   Examiner is relying upon Rogers to teach these limitations. As such, the Examiner's analysis

22   appears to be inconsistent.

23

1   On pages 11 and 12 of the Examiner's Answer, the Examiner made the following

2 assertions:

> 3   Examiner relies upon Rogers to teach this aspect of the invention since to provide the method and
>
> 4   apparatus of Gai with the specific policy examples of stimuli and response consistent with what is
>
> 5   presented in the Applicant's disclosure would have been obvious to one of ordinary skill in the art,
>
> 6   in view of the teachings of Rogers, since all the claimed elements were known in the prior art and
>
> 7   one skilled in the art could have combined the elements as claimed by known methods with no
>
> 8   change in their respective functions, and the combination would have yielded nothing more than
>
> 9   predictable results to one of ordinary skill in the art at the time of the invention, i.e., <u>one skilled in</u>
>
> 10   <u>the art would have recognized that the high-level policies and rules generated in response to</u>
>
> 11   <u>different network traffic situations and conditions would need to include other specific scenarios.</u>
>
> 12   (emphasis added)

13

14 Notwithstanding that the Examiner's analysis is difficult to parse since the Examiner is relying

15 upon both factually-unsupported conclusory statements (i.e., "one skilled in the art could have

16 combined the elements as claimed by known methods ... at the time of the invention") and

17 factually-inaccurate statements, Appellants refer to the underlined portion of the above-

18 reproduced passage. Despite the Examiner's assertion that there is a "**need** to include other

19 specific scenarios," (emphasis) the Examiner has failed to identify where either Gai or Rogers

20 identifies this alleged need within the teachings of Gai. As such, the Examiner's obviousness

21 analysis is improperly relying upon the satisfaction of a need that has not been identified in the

22 prior art.. Moreover, as already noted above, neither the high-level policies nor the rules are

23 generated in response to different network traffic conditions. Therefore, the Examiner's

24 conclusions are not predicated upon substantial evidence that supports the Examiner's analysis.

25

1

2   In response to arguments presented on page 12, lines 3-11 of the Second Appeal Brief

3   (and not responded to by the Examiner in the Third Office Action despite being also presented in

4   the Second Response), the Examiner asserted the following on pages 12 and 13 of the

5   Examiner's Answer:

6   **In reply** to argument (4), examiner asserts Gai-Rogers clearly teaches "generating an

7   administrative policy based upon collected data." Firstly, Examiner notes that in Appellant's

8   arguments of record, Appellant writes, "*the high-level policies disclosed by Gai are more*

9   *comparable to the claimed 'administrative policy for administering the system under study*'

10   (Remarks dated March 5, 2008, pg. 4, lines 2-3). From the Appellant's own words, we see that the

11   Appellant believes that Gai teaches generating an administrative policy. The issue that remains is

12   whether Gai discloses generating this policy based upon collected data.

13

14   The Examiner's response ignores the Examiner's own analysis, which Appellants have just

15   addressed.   As claimed, the administrative policy is generated using data collected by the

16   selected policy maker. Thus, as claimed, the flow of information is as follows:

17   [system under study] → <stimuli and response data> → [selected policy maker] →

18   <collected data> → [policy generation component] → <administrative policy>

19

20   As previously asserted by the Examiner, the high-level policies allegedly correspond to the

21   "response data" that is forwarded to the selected policy maker. However, the Examiner is relying

22   upon the same high-level policies to teach the "administrative policy." Thus, the Examiner's

23   analysis is <u>internally inconsistent</u>. As already discussed above and discussed in the Appeal Brief,

24   the high-level policies of Gai does not corresponds to the claimed "response data." Instead, the

25   high-level policies are more comparable to the claimed administrative policy. Actually, as noted

1   by the Examiner, Appellant did not assert that the high-level policies directly correspond to the

2   claimed administrative policy – only that they were "more comparable."

3

4   In the last sentence of the above-reproduced paragraph, the Examiner states that "[t]he

5   issue that remains is whether Gai discloses generating this policy based upon collected data."

6   The Examiner then assertions the following in the first full paragraph on page 13 of the

7   Examiner's Answer:

8   Upon examination of Gai, we see that Gai clearly and explicitly teaches, "Policy server

9   322 also includes a policy validation tool (PVT) 413 and a policy rule generating engine 414 that

10   are each in communication with the policy translator 410, a device- specific filter entity 416 and a

11   communication engine 418" (Gai, col. 9, lines 61-67). Gai's policy rule generating engine makes

12   rules based on input from the network administrator, the device-specific filter entity, policy

13   translator, repository and from intermediate devices (Gai, fig. 4; col. 9, line 59 — col. 10, line 9).

14   <u>Further, Rogers explicitly teaches</u>, `stimuli are collected and monitored by monitors which detect

15   an event then signal the action interface to initiate the appropriate response (Rogers, col. 5, line 45

16   — col. 6, line 12). Examiner also notes that this argument was clearly addressed and fully

17   responsive to the Appellant in the final Office action (final Office action, mailed October 28,

18   2008; pg. 4-5).

19

20   Prior to the underlined-portion of the above-reproduced passage, the Examiner cites to passages

21   within Gai. However, notably absent from the Examiner's analysis is an assertion that "Gai

22   discloses generating this policy based upon collected data." This is particularly relevant since

23   referring to the last 5 lines on page 2 and the first 4 lines on page 3 of the Examiner's Answer,

24   the Examiner relies upon Gai teaching these limitations.

25

1   Instead, referring to the underlined-portion of the above-reproduced passage, the

2   Examiner entirely switches gears and now decides to cite to Rogers, despite citing to Gai in both

3   the Third Office Action and on pages 2 and 3 of the Examiner's Answer with regard to these

4   limitations. Thus, the Examiner appears to be making a major change in the Examiner's analysis

5   without explicitly noting that this change has been made.

6

7   Notwithstanding the Examiner's new theory as to what Gai does or does not teach, the

8   Examiner's new analysis does not cure the deficiencies of Gai. Specifically, the Examiner asserts

9   that Rogers teaches "stimuli are collected and monitored by monitors which detect an event then

10   signal the action interface to initiate the appropriate response." Notably absent from the

11   Examiner's analysis (or the passage cited by the Examiner) is any mention of collected data

12   being used to generate the policy. Instead, column 5, lines 46-47 of Rogers specifically teaches

13   that "[t]he network policy … is established by the network administrator." The monitors

14   referenced by the Examiner monitor information (e.g., "time of day and data," "quantity of data

15   stored in the file server hard drive and the like"), and based upon the policy and this information,

16   the action interface 30 performs certain actions. Thus, absent from these teachings is the notion

17   of generating an administrative policy based upon collected data, in general, or collected data

18   from the selected policy maker. Thus, the Examiner has failed to establish that either Gai or

19   Rogers, either alone or in combination, teach the limitations at issue.

20

21   _____

22   On page 12, line 18 through page 13, line 31, Appellants noted that the Examiner's cited

23   teachings with Rogers do not appear to differ from the teachings already in Gai. As such,

1   Appellants were not clear as to the relevancy of the teachings of Rogers. The Examiner's

2   response to these arguments are found in the paragraph spanning pages 14-15 of the Examiner's

3   Answer.

4

5   The Examiner's first point is to describe how the Examiner cited Rogers after Appellants

6   successfully traversed a rejection under 35 U.S.C. § 102 based upon Gai.

7

8   The Examiner's second point is a restatement of the Examiner's characterization of the

9   teachings of Gai. As already discussed above, the Examiner has mischaracterized the scope and

10   content of Gai.

11

12   With regard to the Examiner's third point, the Examiner states the following on pages 14

13   and 15 of the Examiner's Answer:

14   Thirdly, Examiner notes that in Appellant's arguments of record, Appellant writes, *"Applicants are*

15   *unclear how the 'high-level policies' of Gai are from the system under study, as claimed. Instead,*

16   *Gai teaches that `[t]he high-level policies...are selected by a network administrator.'* "(Remarks

17   dated March 5, 2008, pg. 3, lines 1722). To address these argued deficiencies of Gai, Examiner

18   has brought in the <u>Rogers reference to teach a system administration component that clearly and</u>

19   <u>explicitly makes policy decisions based on data and input from the system</u>. Specifically, Rogers

20   discloses **a systems administration component** (Rogers, col. 2, lines 6-9, i.e. systems

21   administration component) **coupled to a system under study** (Rogers, col. 2, lines 10-14). Rogers

22   discloses **stimuli** (Rogers col. 2, lines 17-18; *changing network states as signaled by events*

23   *monitored within the network,* i.e. stimuli) **and response data** (Rogers col. 2, lines 15-17;

24   *execution of the computer network programs in response* to the aforementioned stimuli) **from said**

25   **system under study** (Rogers, col. 2, lines 10-14). (emphasis in original; underline added)

26

1   The Examiner appears to be confused as to the difference between making decisions based upon

2   policy and making policy. The Examiner asserts that "Rogers reference to teach a system

3   administration component that clearly and explicitly makes policy decisions based on data and

4   input from the system." Appellants do not disagree that Rogers makes policy decisions (i.e.,

5   decisions based upon policy) based on data. However, Gai also makes the same policy decisions

6   based on data. Specifically, referring to column 19, line 41 through column 20, line 41, Gai

7   describes how the policy rules are implemented as specific intermediate devices. For example,

8   referring more specifically to column 19, lines 54-62 of Gai, the traffic management controller

9   512 or the router 318 performs certain functions based upon data and input from the system.

10

11   Thus, as argued in the Appeal Brief, both Gai and Rogers share the common aspect of

12   generating rules and based upon data within a system, the rules are used to control certain

13   aspects of the system. However, contrary to the Examiner's position, Rogers does not teach

14   making policy based on data and input from the system. Therefore, Appellants maintain that the

15   Examiner has failed to properly characterize the scope and content of Rogers.

16

17   On page 15 of the Examiner's Answer, the Examiner further asserted the following:

18   Examiner relies upon Rogers to teach these aspects of the invention since to provide the method

19   and apparatus of Gai with the specific policy examples of stimuli and response consistent with

20   what is presented in the Applicant's disclosure would have been obvious to one of ordinary skill in

21   the art, in view of the teachings of Rogers, since all the claimed elements were known in the prior

22   art and one skilled in the art could have combined the elements as claimed by known methods

23   with no change in their respective functions, and the combination would have yielded nothing

24   more than predictable results to one of ordinary skill in the art at the time of the invention, i.e., one

25   skilled in the art would have recognized that the high-level policies and rules generated in

1   response to different network traffic situations and conditions would need to include other specific

2   scenarios. Examiner also notes that this argument was clearly addressed and fully responsive to

3   the Appellant in the final Office action (final Office action, mailed October 28, 2008; pg. 3-5).

4

5   This obviousness analysis is similar to the obviousness analysis presented by the Examiner on

6   pages 11 and 12 of the Examiner's Answer.

7

8   The Examiner's analysis appears to be pulled Rationale (A), entitled "Combining Prior Art

9   Elements According to Known Methods to Yield Predictable Results," from the Examination

10   Guidelines for Determining Obviousness. These Guidelines were discussed on 5-7 of the Appeal

11   Brief. However, the Examiner's reliance upon Rational (A) is new. Referring to Rationale (A), the

12   Guidelines state that the following findings of fact <u>must</u> be articulated by the Examiner:

13   (1) a finding that the prior art included each element claimed, although not

14   necessarily in a single prior art reference, with the only difference between the

15   claimed invention and the prior art being the lack of actual combination of the

16   elements in a single prior art reference;

17   (2) a finding that one of ordinary skill in the art could have combined the

18   elements as claimed by known methods, and that in combination, each element

19   merely would have performed the same function as it did separately;

20   (3) a finding that one of ordinary skill in the art would have recognized

21   that the results of the combination were predictable; and

22   (4) whatever additional findings based on the Graham factual inquiries

23   may be necessary, in view of the facts of the case under consideration, to explain

24   a conclusion of obviousness.

1

2   Referring to finding (1), the Examiner has failed to establish that the prior art includes

3 each element with the <u>only difference</u> between the claimed invention and the prior art being the

4 lack of actual combination of the elements in a single prior art reference. For example, as noted

5 previously, Both Gai and Rogers do not teach all the limitations for which the Examiner is

6 relying upon Gai and Rogers to teach. Additionally, even based upon the Examiner's own

7 analysis, the only difference between the claimed invention and the prior art is not the lack of an

8 actual combination of elements. Instead, certain portions of Gai would have to be replaced by

9 the teachings of Rogers. Regardless as to the differences, the Examiner has <u>presented no</u>

10 <u>substantial evidence</u> to support the Examiner's conclusory statements.

11

12   Referring to finding (2), the Examiner has failed to identify how one of ordinary skill in

13 the art would have combined the elements or the known method that would be employed to

14 combine these elements. Moreover, the Examiner has failed to present any evidence that each

15 element would have performed the same function as it did separately.

16

17   Referring to finding (3), the Examiner has failed to present any substantial evidence that

18 one of ordinary skill in the art would have (i) known the results of the combination and (ii)

19 recognized that the results of the combination were predictable.

20

21   Appellants have already addressed finding (4) above.

22

23

1   In response to arguments presented on page 14, lines 3 through page 15, line 2 of the

2   Appeal Brief (and not responded to by the Examiner in the Third Office Action despite being

3   also presented in the Second Response), the Examiner asserted the following on page 16 of the

4   Examiner's Answer:

5   **In reply** to argument (6), examiner asserts this argument has been previously addressed

6   in reply to argument (5) as Examiner has presented the logic, rationale, evidence and support for

7   the combination of Gai and Rogers.

8

9   Appellants have already addressed the Examiner <u>new</u> obviousness analysis (compare the

10   Examiner's old obviousness analysis in the first full paragraph on page 4 of the Examiner's

11   Answer with the Examiner new analysis in the first paragraph on page 15 of the Examiner's

12   Answer).

13

14   _____

15   <u>Claim 3</u>

16   Appellants presented substantial arguments with regard to claim 3 on page 15, line 8

17   through page 18, line 1 of the Appeal Brief. The Examiner's first response to these arguments is

18   found on page 17 of the Examiner's Answer, in which the Examiner asserted:

19   **In reply** to argument (7), examiner asserts this argument has been previously addressed

20   in reply to argument (5) as Examiner has presented the logic, rationale, evidence and support for

21   the combination of Gai and Rogers. Further, Examiner has presented logic, rationale, evidence and

22   support for the teachings of "stimuli" and "response" in Gai and Rogers in reply to arguments 3

23   and 5 above.

24

1   The Examiner's response completely ignores that the arguments at issue regard claim 3.

2   Specifically, although claim 1 refers to "stimuli and response data from said system under

3   study," claim 3 recites "detecting a stimuli in a system under study and monitoring a response by

4   a systems administrator to said stimuli." Thus, claim 3 involves different limitations than those

5   found in claim 1.

6

7   Specifically, claim 3 clarifies that the response is by a systems administrator. Moreover,

8   since the response to forwarded to the policy maker, the systems administrator and the policy

9   maker are not one in the same. However, the Examiner's teachings regarding the alleged

10 "response data" involve a response by the policy server of Gai (i.e., the alleged policy maker).

11 Thus, the Examiner is relying upon the same feature (i.e., the policy server of Gai) to teach both

12 the systems administrator and the policy maker. Such an analysis, however, is inconsistent with

13 the language of claim 3, which recites "forwarding said stimuli and said response to a policy

14 maker suited to analyze said stimuli and said response." The Examiner's above-reproduced

15 response does not recognize these differences when the Examiner relies upon the Examiner's

16 analysis as to claim 1 regarding "argument (5)."

17

18 Also with regard to claim 3, on page 17 of the Examiner's Answer, the Examiner

19 presented the following additional assertions:

20   **In reply** to argument (8), examiner asserts this argument has been previously addressed

21   in reply to argument (5). Furthermore, Examiner has presented logic, rationale, evidence and

22   support for all arguments and noted their previous, fully responsive responses of record in reply to

23   arguments 1-7 above.

24

1   Appellants stated in the paragraph spanning pages 17 and 18 of the Appeal Brief, that the

2   arguments presented in the Appeal Brief as to claim 3 have not been addressed in the Third

3   Office Action despite being presented in the Second Response. Based upon the above-

4   reproduced paragraph, Appellants can further state that the Examiner has <u>again ignored</u>

5   Appellants' arguments.

6

7

For the reasons set forth in the Appeal Brief of April 28, 2009, and for those set forth herein, Appellants respectfully solicit the Honorable Board to reverse the Examiner's rejection under 35 U.S.C. § 103.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 09-0461, and please credit any excess fees to such deposit account.

Date: December 14, 2009   Respectfully submitted,

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